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*Via ECF* June 26, 2025

Hon. Jeannette Vargas Daniel Patrick Moynihan United States Courthouse 500 Pearl Street New York, NY 10007-1312

Re: <u>Douglas v. Sensio, Inc.</u>

Docket No. 1:22-cv-8711 (JAV)

Dear Judge Vargas:

Pursuant to Your Honor's Order of May 2, 2025, the parties respectfully submit this joint status report concerning discovery in the above-referenced matter. Since our last conference with the Court, the only outstanding discovery is a deposition of Sensio's Rule 30(b)(6) witness which is scheduled for July 8, 2025 and the deposition of Plaintiff's expert which is scheduled for July 25, 2025. The parties recognize that these depositions have been scheduled outside of the discovery deadline of June 30, 2025. However, the parties have conferred in good faith and have navigated summer plans of counsel and the witnesses to arrive at the deposition dates set forth above. As such, the parties respectfully request that the discovery deadline be extended one last time to July 31, 2025.

We thank the Court for its time and consideration of this matter.

Respectfully submitted,

JOHNSON BECKER PLLC

COLELLA ZEFUTIE LLC

s/ Adam J. Kress

s/ John J. Zefutie, Jr.
John J. Zefutie, Jr.

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